

UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF WYOMING

STEPHANIE WADSWORTH,
Individually and as Parent and Legal
Guardian of W.W., K.W., G.W., and
L.W., minor children, and MATTHEW
WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-KHR

PLAINTIFFS' MOTION FOR ADMISSION TO APPEAR *PRO HAC VICE*

Pursuant to Local Rule 84.2(b), Plaintiffs Stephanie Wadsworth, Individually and as Parent and Legal Guardian of W.W., K.W., G.W., and L.W., minor children and Matthew Wadsworth, by and through their undersigned counsel, respectfully submit the following Motion to grant attorney Andrew F. Knopf permission to appear *pro hac vice*.

1. I, Taly Goody, an attorney with Good Law Group, P.A., 58 Malaga Cove Plaza, Palos Verdes Estates, CA 90274, Email: taly@goodylawgroup.com, telephone number (310) 893-1983, am counsel for the Plaintiffs in the above-captioned matter.
2. I, Taly Goody, certify I am a member in good standing with the Wyoming Bar Association and the U.S.D.C. District Court of Wyoming Bar. My

Wyoming Bar Number is 8-6737. I was admitted to practice in the District Court of Wyoming on June 30, 2023.

3. Movant, Andrew F. Knopf, is an attorney with Paul Knopf Bigger, 1560 N. Orange Avenue, Suite 300, Winter Park, FL 32789, Email: andrew@pkblawfirm.com, telephone number (407) 622-2111.
4. To the best of my knowledge and belief, Mr. Knopf is of good moral character. He is an attorney duly licensed and in good standing with the Florida State Bar, admitted on September 18, 2003. He has never been denied *pro hac vice* admission or had admission revoked in any court. Mr. Knopf has never been disciplined or sanctioned by any court.
5. As local counsel, I affirm that I shall be fully prepared to represent the client at any time, and in any capacity.

ACCORDINGLY, Plaintiff respectfully moves the Court to enter an Order permitting Andrew F. Knopf to appear in this matter *pro hac vice*.

Date: February 5, 2025

Respectfully Submitted,

/s/ Taly Goody, Esq.

TALY GOODY, Esq.

Wyoming Bar No.: 8-6737

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**Pro Hac Vice Pending*

Counsel for the Plaintiffs

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 5, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Taly Goody

Taly Goody